

May 26, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: **COMMENTS in IB Docket No. 04-286**

Dear Ms. Dortch:

The National ITFS Association (“NIA”) and the Catholic Television Network (“CTN”) hereby provide these comments in connection with the proposals of the United States of America for WRC-2007 that were approved by the FCC WRC Advisory Committee on April 27, 2006.

NIA, established in 1978, is a non-profit, professional organization of Educational Broadband Service (“EBS”) licensees, applicants and others interested in EBS. The goals of the NIA are to gather and exchange information about EBS, to act as a conduit for those seeking information or assistance about EBS, and to represent the interests of EBS licensees and applicants. CTN is an association of Roman Catholic archdioceses and dioceses that operate many of the largest parochial school systems in the United States. CTN’s members use EBS frequencies to distribute educational, instructional, inspirational, and other services to schools, colleges, parishes, community centers, hospitals, nursing homes, residences, and other locations. Collectively, CTN’s members serve over 600,000 students and 4,000,000 households throughout America.

As representatives of EBS licensees and other educational interests nationwide and active participants in the activities of Informal Working Group 3 and Joint Task Force 6-8-9, NIA and CTN have a significant stake in the outcome of this proceeding, to the extent that any such outcome might result in interference to EBS stations in the 2500 – 2690 MHz band (“2.5 GHz Band”).

The critical issue for NIA and CTN, and the EBS and educational community generally, is to ensure that terrestrial systems in the United States in the 2.5 GHz Band, including EBS stations, are fully protected from interference from satellite systems, particularly Mobile Satellite Service (“MSS”) systems licensed by foreign governments. Thus NIA and CTN worked in the IWG-3 and JTG 6-8-9 to support the elimination of MSS allocations in the 2.5 GHz band and the adoption of hard

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power flux density ("PFD") limits on MSS satellites. We have been largely pleased by the WRC Advisory Committee's recommendations in these respects.

We write now to confirm that NIA, CTN and the constituencies they represent here -- including broad public and private educational interests in the United States -- support the work of the WRC Advisory Committee, and would strongly oppose any weakening of the position of the United States with respect to the elimination of MSS allocations in the 2.5 GHz band or the requirement of the recommended PFD limits.

NIA and CTN fully support the comments being filed today in this proceeding on these issues by the Wireless Communications Association International ("WCA"), and urge the Commission to confirm that it will proceed on these issues in accordance with the WCA's positions and those recommended by the WRC Advisory Committee.

Respectfully submitted,

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